

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Melissa Cowles, Tammy Clark, and Becky)	
Brooks, on behalf of themselves and all other)	
plaintiffs similarly situated known and)	
unknown,)	
)	Case No. 16 cv 7876
Plaintiffs,)	
)	
v.)	Magistrate Judge Maria Valdez (by consent)
)	
Big Apple Joliet, Inc.,)	
Panagiotis Hronopoulos, individually,)	
)	
Defendants.)	

**JOINT MOTION TO AMEND
THE COURT APPROVED SETTLEMENT AGREEMENT**

Plaintiffs Melissa Cowles, Tammy Clark, and Becky Brooks, individually and on behalf of all others similarly situated (collectively “Plaintiffs”), and Defendants Big Apple Joliet, Inc. and Panagiotis Hronopoulos (“Defendants”) (collectively “Parties”), by and through their undersigned counsel, respectfully seek to amend the Court approved Settlement Agreement to allow the parties to redistribute \$410 among the Plaintiffs. In support of their Motion, the Parties state as follows:

1. On March 6, 2018, the Court approved the Parties’ Settlement Agreement, which included a Settlement Payment in the gross sum of \$77,000.00. Dkt. Nos. 80, 81. In addition, the Court granted the Plaintiffs’ unopposed oral motion to dismiss Plaintiff Tamara Mutz with prejudice (Dkt. No. 80), which, as a result, reduced the total gross settlement amount to \$76,850.00.

2. While preparing the final settlement payment list containing the payment amounts to class members, the Parties discovered a small mathematical error leaving \$410 in excess funds that has not been attributed to any Plaintiff.

3. On March 20, 2018, the Parties agreed to amend the Settlement Agreement by equally distributing the remaining \$410.00 among all Plaintiffs (excluding Ms. Mutz who has been dismissed).

WHEREFORE, the Parties respectfully seek that the Court grants this Motion.

Dated: March 29, 2018

Jointly and respectfully submitted,

By: /s/ Antonio Caldarone
Attorney for Defendants

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CERTIFICATE OF SERVICE

Antonio Caldarone, an attorney, hereby certifies that he caused the **Joint Motion To Amend The Court Approved Settlement Agreement** in the above-captioned matter, to be served via the electronic filing system to the Clerk of Court, and via the electronic filing system to the parties of record listed below, on this 29th day of March, 2018, addressed to:

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/s/Antonio Caldarone